

gregg - File

146439

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: OCT 03 1983

SUBJECT: Chemical Recovery Systems, Inc., Consent Decree Tracking System

FROM: *R.E. Bartelt*
R.E. Bartelt, Chief
Remedial Response Branch

TO: B.G. Constantelos, Director
Waste Management Division

I recommend that we adopt the following tracking system format for the Chemical Recovery Consent Decree. The first tracking report for the Consent Decree has been prepared assuming this format is acceptable and is attached.

1. Cover Sheet

The cover sheet will flag to the supervisory structure any problem areas within the report. In particular, this would highlight any dates that have not been or are not expected to be met. A new cover sheet will be prepared with each report.

2. Tracking Log Sheets

All discrete events are listed on the tracking log sheets. Events are listed in the order they appear in the Consent Decree.

3. Procedures Concerning the Tracking System

The tracking report will be updated in October and in conjunction with receipt of the results of the sampling and analysis conducted approximately every six months for the next two years.

The routing/distribution list for the report is as follows:

B. Constantelos, 5H	R. Grimes, 5C
D. Stringham, 5H	J. McPhee, 5C
R. Bartelt, 5HR	K. Sutula, U.S. Attorney's Office, Cleveland
G. Vanderlaan, 5HR	P. Schaeffer, DOJ, D.C.
R. Schaefer, 5C	M. Kosakowski, OWPE, HQ
	D. Whoite, OLEC, HQ

Attachment

cc: Vanderlaan, 5HR
McPhee, 5C

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: OCT 03 1983

SUBJECT: September Monthly Tracking Report
Chemical Recovery Consent Decree

FROM: Gregg Kulma, OSC
Remedial Response Section 1

TO: See Addresses Below

The following are brief discussions on various items and topics involved in the subject Consent Decree.

1. The Consent Decree was lodged with the United States District Court, Northern District of Ohio, Eastern Division, on August 12, 1983.
2. I was contacted by Jon McPhee on August 24, 1983, and advised that Chem Recovery was prepared to conduct the site inspection required by the Consent Decree on either August 31 or September 1, 1983. I arranged to conduct the inspection with representatives of Chemical Recovery on September 1, 1983. See the attached Trip Report for details.
3. Another site inspection will be scheduled for early October.

Attachment

Addressees

B. Constantelos, 5H	R. Grimes, 5C
D. Stringham, 5H	J. McPhee, 5C
R. Bartelt, 5HR	K. Sutula, U.S. Attorney's Office, Cleveland
G. Vanderlaan, 5HR	P. Schaeffer, DOJ, D.C.
R. Schaefer, 5C	M. Kosakowski, OWPE, HQ
	D. Whoite, OLEC, HQ

Chemical Recovery Systems, Inc.
Consent Decree
Tracking Report

Date Due	Date REC'D	Sect. or App.	EVENT	Compliance		Frequency of Event	Notes
				Yes	No		
8/15/83	9/1/83	V.A. (1)	Jointly conduct a visual inspection of the site with U.S. EPA technical personnel, to identify spots of visibly contaminated soil if any.	X		ONE-TIME	Due to delays in administrative processing of the consent decree, it was not lodged with the court until 8/12/83, making it impossible to meet the due date. However, the intent of the consent decree was met.
8/15/83		V.A. (2)	Excavate all visibly contaminated soil identified by inspection in V.A. (1)			ONE-TIME	Excavation of the perimeter of the Brighton Still Building accomplished. Remainder of soil removal to be accomplished in prior to site grading week of 9/12/83.
8/15/83	9/1/83	V.A. (3)	Excavate the perimeter of the Brighton Still Building, to a depth of one foot, and to a distance of two feet beyond the perimeter of the foundation.	X		ONE-TIME	Site inspection was conducted on September 1, 1983. The perimeter of the building was excavated and backfilled in accordance with the consent decree.
8/15/83		V.A. (4)	Dispose of all soil removed in these excavation in an U.S. EPA approved waste disposal site.			ONE-TIME	Soil excavated from perimeter of the Brighton Still Building was removed and transported to Wayne Disposal in Belleville, Michigan. Other soils to be removed prior to grading and seeding of the sight.

Chemical Recovery Systems, Inc., Consent Decree Tracking Report

Date Due	Date REC'D	Sect. or App.	EVENT	Compliance		Frequency of Event	Notes
				Yes	No		
8/15/83		V.A. (5)	Backfill the excavated areas with clean clay-containing fill, as necessary, and grade to conform with existing terrain.			ONE-TIME	After excavation of the perimeter of the Brighton Still Building, it was backfilled with clean clay-containing fill. Other backfilling will occur prior to grading and seeding of the sight.
8/15/83		V.A. (6)	Gently grade site towards the river bank to a slope of approximately 3%			ONE-TIME	Chemical Recovery target date is 9/15/83.
10/07/83		V.B.	At the next horticulturally appropriate time, CRS will seed the site with appropriate grasses.			ONE-TIME	
12/22/83		V.C.	CRS will conduct monitoring of the Black River adjacent to the site a total of four times following entry of the Consent Decree for PCBs and volatile organics. Each monitoring to consist of at least three samples, one upstream and one downstream and shall be depth-integrated. Sampling and analysis to be conducted according U.S. EPA protocols. Sampling shall take place once each Spring during the first period of intensive melting snow, or w/in 48 hrs. of the first rainfall one inch or more after March 1, whichever occurs first, but in no case later than 6/22/83 and 6/22/84; and once each fall w/in 48 hrs. after first rainfall of one inch or more following 8/15, but in no case later than 12/22/83 and 12/22/84			Twice per year, four times total	
6/22/84							
12/22/84							
6/22/85							